

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

April 22, 2008

Dear Ms. Dortch,

Regarding the call for comments regarding proceeding number 04-233, I would like to express my concern over the tremendous hardships that small public radio networks like ours would experience should these proposals be enacted.

Our network, consisting of KDAQ Shreveport, KLSA Alexandria, KBSA El Dorado and KLDN Lufkin, is unusual in that we serve a large geographic area with several medium cities and considerable rural area spread over a region that impacts listeners in 4 states. At one point this was the single largest region in the United States that did not have access to public radio. Currently, we are able to serve this region well, but only because the varied communities we serve are able to pool their resources to bring a higher level of service than any one of them would be able to accomplish on their own.

Certainly most of the rural areas would have no access to national or regional public radio programming at all if not for the efforts of Red River Radio, our local network name.

As an example of how fragile stations in regions like ours can be, I remind you of station KTPB just to our west. The station was unable to support itself and the college licensee was forced to sell. This has left much of that region without public radio except for those able to receive our fringe signal.

Although we are able to maintain a high level of service to this region, there is no room to spare economically. All of the money we receive each year is spent on operations and programming with nothing left over. The proposed requirement of having to add a studio in each of our cities would destroy us financially and probably mean the end of serving these communities. We have no reserve fund from which to build and are currently having difficulty finding the funding to build a new main studio facility let alone additional studios. (We have been housed in temporary buildings on the LSUS campus for 24 years.)

The more complicated paperwork within the new proposals would also be a hardship for stations like us. Our staff is very small and hardworking and there is plenty of work to occupy them. Additional paperwork that would track all of the news and informational programming would stretch an already overworked staff.

We already have a community advisory board that represents each of the separate areas that we serve. It is a good relationship that we have with them. Changing any aspect of this relationship would only be a diminishing of the service we already provide.

I think it important for the commission to know that even though we are a network, we are one that spends a great deal of time making sure we serve all of our communities equally well. We have upgraded our transmitters to hybrids so that we can provide many more programs to our listeners. In addition to this letter, I have also attached a list of stories that our news director has covered over the last year. As you will see, every region is covered, as well as the smaller communities in between.

I ask the FCC to please exempt public radio stations from any localism proposals that would create such hardships as mentioned above. The only result these proposals could have would be to damage a level of service that we and the members of our communities have worked so hard to achieve.

Thank you for consideration of this letter.

Respectfully submitted,

Kermit Poling,  
General Manager,

Red River Radio Network  
KDAQ, Shreveport, LA  
KLSA, Alexandria, LA  
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